

**U.S. Department of Justice**



*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 1, 2020

**BY ECF**

Honorable Jed S. Rakoff  
United States District Judge  
Southern District of New York  
New York, New York 10007

**Re:     *United States v. Hamid Akhavan et al, S3 20 Cr. 188 (JSR)***

Dear Judge Rakoff:

As the Court is aware, trial in the above-captioned matter was previously set to begin today, December 1, 2020. The Court previously excluded time from April 28, 2020, through today, pursuant to the Speedy Trial Act, on the basis that the exclusion was “necessary for the completion of discovery, the making and deciding of motions, the accommodation of counsel’s complicated schedules, the special delays put in place by the coronavirus crisis,” among other reasons. (Dkt. No. 30 at 12:18-21). As of today, all in-person court proceedings in this district have been suspended until January 15, 2021, in order to “preserve public health and safety in light of the recent spike in coronavirus cases, both nationally and within the Southern District of New York.” (See Standing Order, M-10-468 (CM)). For the reasons set forth in the Chief Judge’s Standing Order, as well as those previously stated by the Court when it excluded time through today, the Government respectfully requests the exclusion of time under the Speedy Trial Act from today through January 15, 2021.

Respectfully submitted,

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By:

/s/  
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Cc: Defense counsel (ECF)